LAW OFFICE OF KENNETH J. MONTGOMERY P.L.L.C.

198 ROGERS AVENUE BROOKLYN, NEW YORK 11225 PH (718) 403-9261 FAX (347) 402-7103

ken@kjmontgomerylaw.com

March 17, 2022

BY ECF

The Honorable Valerie E. Caproni (VEC) United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 **MEMO ENDORSED**

USDC SDNY DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 3/17/2022

Re: *United States v. Quashawn Escalera*, 21 Cr. 667 (VEC)

Dear Judge Caproni:

This is a request on behalf of Mr. Escalera to modify his current supervised release condition, which disallows him from entering or frequenting the Bronx. Mr. Escalera is expecting his child to be born in the next two weeks. The hospital that the child is expected to be delivered at is Montefiore hospital in the Bronx. Mr. Escalera would like permission to be present when his child is born at the time of delivery which may be after his curfew hour of 9 pm.

Thank you for the Court's time and consideration in this matter.

Respectfully,

Kenneth, J. Montgomery

s/

Kenneth J. Montgomery

Application GRANTED. Mr. Escalera's bail conditions are modified such that Mr. Escalera is permitted to enter the Bronx and be out after curfew hours in order to be present for the birth of his child. Mr. Escalera must notify his Probation officer as soon as he knows that the child is being delivered.

Mr. Escalera may remain in the Bronx from the time he is notified that the mother of his child is going to the hospital until the mother and baby return home after delivery, if he is in the hospital with the mother. If, for any reason, the baby is kept in the hospital after the mother is released, Mr. Escalera must notify Probation if he wants further permission to be in the Bronx.

SO ORDERED.

3/17/2022

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE